



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 16, 2011

Mr. Chris Firestone  
Pennsylvania Department of Conservation & Natural Resources  
Bureau of Forestry – Plant Program  
Forest Advisory Services  
P.O. Box 8552  
Harrisburg, PA 17105-1673

SUBJECT: REQUEST FOR LIST OF PROTECTED SPECIES WITHIN THE AREA UNDER  
EVALUATION FOR THE LIMERICK GENERATING STATION, UNITS 1 AND 2,  
LICENSE RENEWAL APPLICATION REVIEW (PNDI NUMBER: 21136)

Dear Mr. Firestone:

The U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing an application submitted by Exelon Generation Company, LLC (Exelon), for the renewal of the operating license for Limerick Generating Station, Units 1 and 2 (Limerick). Limerick is located in Limerick Township of Montgomery County, PA, and is approximately 35 miles upriver of Philadelphia. The application for renewal was submitted in a letter dated June 22, 2011, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54.

The NRC has established that, as part of the staff's review of any nuclear power plant license renewal application, a site-specific Supplemental Environmental Impact Statement (SEIS) to its "Generic Environmental Impact Statement for License Renewal of Nuclear Plants," NUREG-1437, will be prepared under 10 CFR Part 51, the NRC's regulation that implements the National Environmental Policy Act of 1969, as amended. The SEIS includes an analysis of pertinent environmental issues, including endangered or threatened species and impacts to fish and wildlife. This letter is being submitted under the provisions of the Endangered Species Act of 1973, as amended, and the Fish and Wildlife Coordination Act of 1934, as amended.

Limerick is a two-unit site with forced-circulation General Electric boiling-water reactors. The facilities consist of the reactor enclosures, turbine enclosures, cooling towers, electrical substations, independent spent fuel storage installation, Schuylkill River Pumphouse, and spray pond. Additional facilities are the cooling-tower blowdown discharge line and associated structures, which are submerged immediately downriver from the Schuylkill River Pumphouse.

The Limerick plant site contains a total of 645 acres, including 491 acres in Montgomery County and 154 acres in Chester County. The proposed action includes the use and continued maintenance of existing plant facilities and transmission lines. See Enclosures 1 – 5 for figures of the facilities and transmission lines. Exelon states that it has no plans for refurbishment or replacement activities to support renewal of the operating licenses.

As part of the SEIS preparation, the applicable transmission line corridors will be reviewed. The Limerick transmission system is comprised of the transmission lines and associated structures from the three main power transformers of Limerick Unit 1 to the Limerick 230-kV Substation, and the three main power transformers of Limerick Unit 2 to the Limerick 500-kV Substation; both substations are located on the plant site. The system also includes the substations,

transmission lines, and associated structures to connect Limerick to the regional electricity grid, including:

- two 230-kV lines, designated 220-60 and 220-61, connecting the Limerick 230-kV Substation to the Cromby Substation located at Exelon Generation's Cromby Generating Station;
- one 230-kV line, designated 220-62, connecting the Cromby Substation to the North Wales Substation and the regional electricity grid;
- one 230-kV line connecting the Cromby Substation to the Plymouth Meeting Substation and the regional electricity grid, consisting of:
  - One segment, designated 220-63, connecting the Cromby Substation to the Barbadoes Substation; and
  - One segment, designated 220-64, connecting the Barbadoes Substation to the Plymouth Meeting Substation; and
- one 500-kV line, designated 5031, connecting the Limerick 500-kV Substation to the Whitpain Substation and the regional electricity grid.

Additionally, the transmission system includes the rights-of-way (ROWs) for the transmission lines. These ROWs were either pre-existing at the time Limerick was built (i.e., the lines are being shared with other linear features that were already in place) or were added in conjunction with construction. The system is basically the same as originally constructed. See Enclosure 5 for an overview of the transmission line ROW routes, which traverse Montgomery County and Chester County.

The four offsite 230-kV lines exclusively serve Limerick, Unit 1, and the one offsite 500-kV line exclusively serves Limerick, Unit 2. Exelon states in the LRA, "[e]ven though these lines were constructed solely to serve the Limerick units, it is anticipated that some or all of these lines would continue to be used for transmitting electricity produced by other generating sources even if the Limerick operating licenses are not renewed."

PECO, the energy delivery subsidiary of Exelon Corporation serving retail customers in southeastern Pennsylvania, owns in fee the offsite substations and a portion of the transmission line ROWs associated with the transmission system. A significant portion of the transmission system is located over or under highways, streets, other public places or property owned by others, for which PECO has permits, grants, easements, or licenses.

To support the SEIS preparation process and to ensure compliance with Section 7 of the Endangered Species Act, the NRC requests a list of species and information on protected, proposed, and candidate species and critical habitat that may be in the vicinity of Limerick and its associated transmission line ROWs. The applicant, Exelon, corresponded with your office by letter dated January 19, 2011. You replied by letter dated March 9, 2011 (PNDI Number: 21136), with a list of plant and terrestrial invertebrates species, and natural communities and geologic features potentially occurring in the vicinity of the plant and its associated transmission line ROWs. To avoid any duplication of effort, you may confirm that the list previously provided to Exelon from your office is still current rather than compiling a new list. If any information is

not current, please provide any applicable updates. Both the January 2011 letter from Exelon and the March 2011 letter from The Pennsylvania Department of Conservation and Natural Resources are enclosed for your reference. In addition, please provide any information you consider appropriate under the provisions of the Fish and Wildlife Coordination Act.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011, in the area of Limerick. The first session will be held in the afternoon and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 p.m. until 4:00 p.m. and the evening session will be from 7:00 p.m. until 9:00 p.m. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open House. Your office will receive a copy of the draft SEIS along with a request for comments. The anticipated publication date for the draft SEIS is August 2012.

The Limerick license renewal application is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>. If you have any questions or require additional information, please contact Mrs. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,

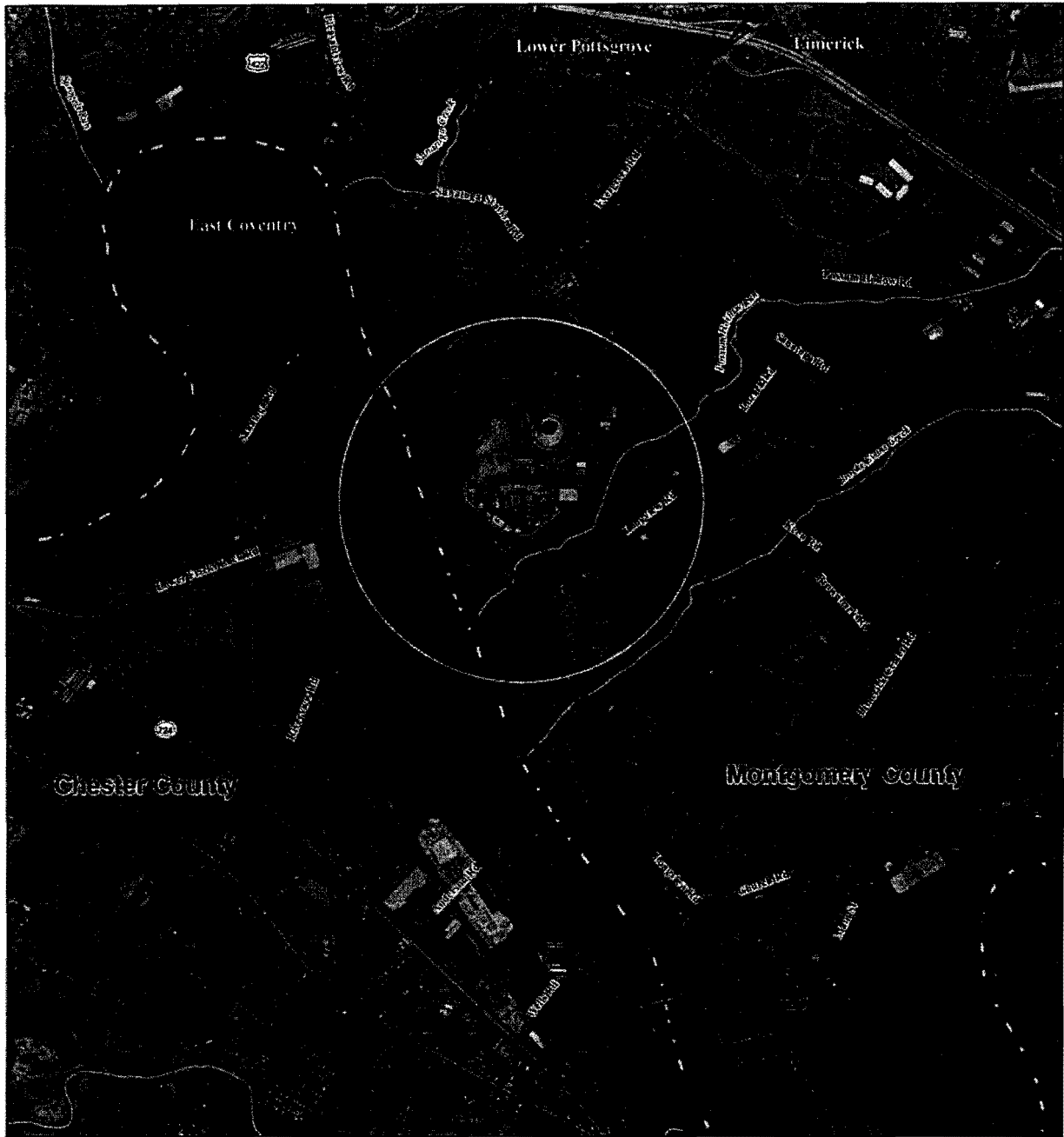
A handwritten signature in black ink, appearing to read 'D. Wrona', followed by the word 'for' written in a smaller, cursive script.

David J. Wrona, Chief  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:  
As stated

cc w/encls: Listserv



**Exelon.**

Reference:  
 DVRPC 2005 Aerial Imagery  
 ESRI 2009 Streets and Roads  
 NAD 1983 State Plane Pennsylvania South  
 Projection: Lambert Conformal Conic  
 Linear Unit: Foot US

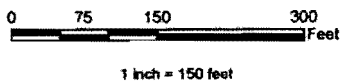
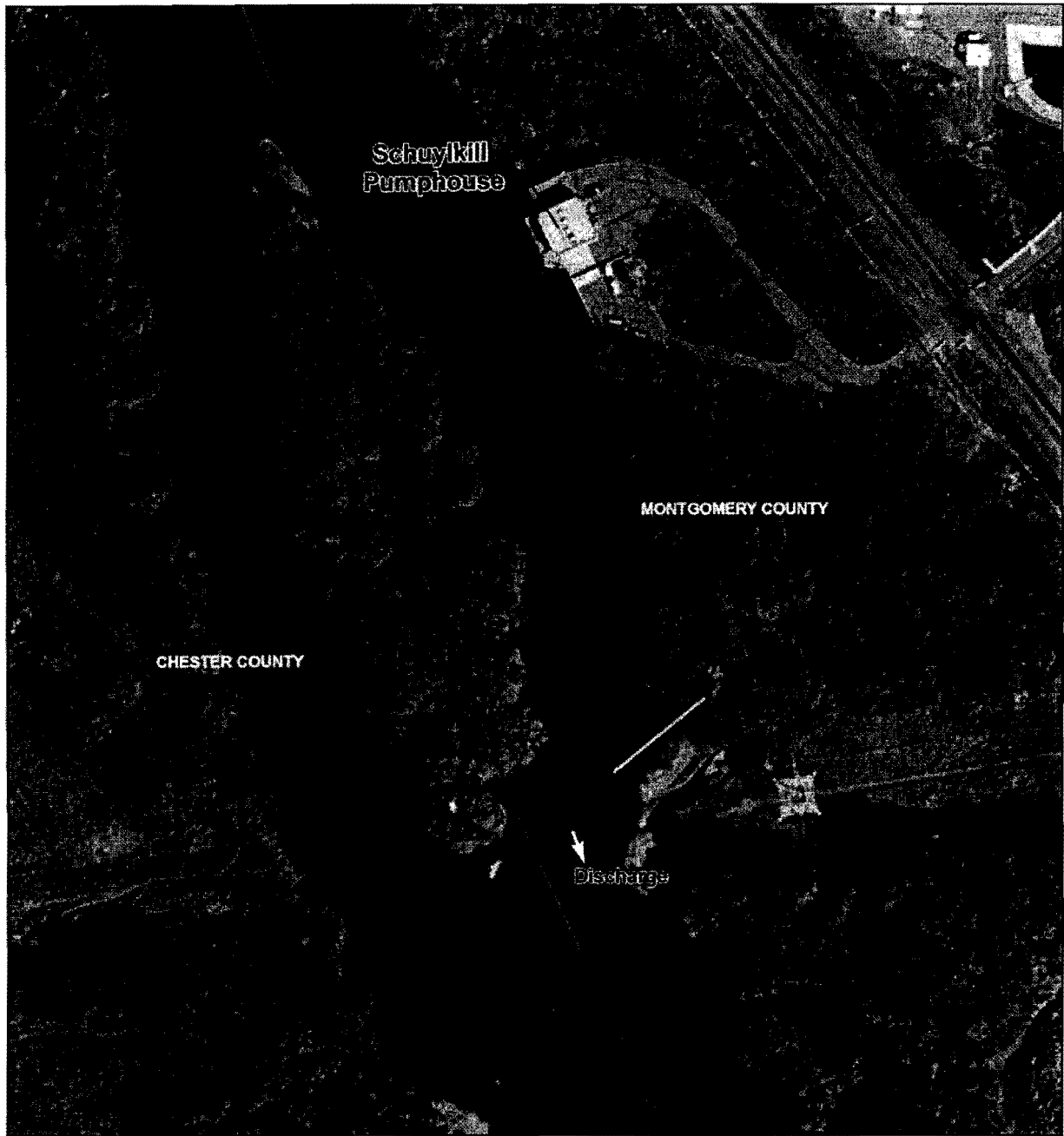


Total Exelon Generation-owned property  
 649 acres

**Legend**

- Exelon Generation Property Boundary
- County Boundary
- Municipal Boundary
- 2500 Ft Radius Exclusion Area
- Conrail Line

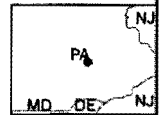
**Figure 2.1-1 LGS Plant Site Boundary**  
 Exelon Generation  
 Limerick Generating Station  
 Limerick Township, Montgomery County, PA



**Exelon.**

Reference:  
Bing Maps Aerial Imagery  
ESRI 2009 Streets and Roads

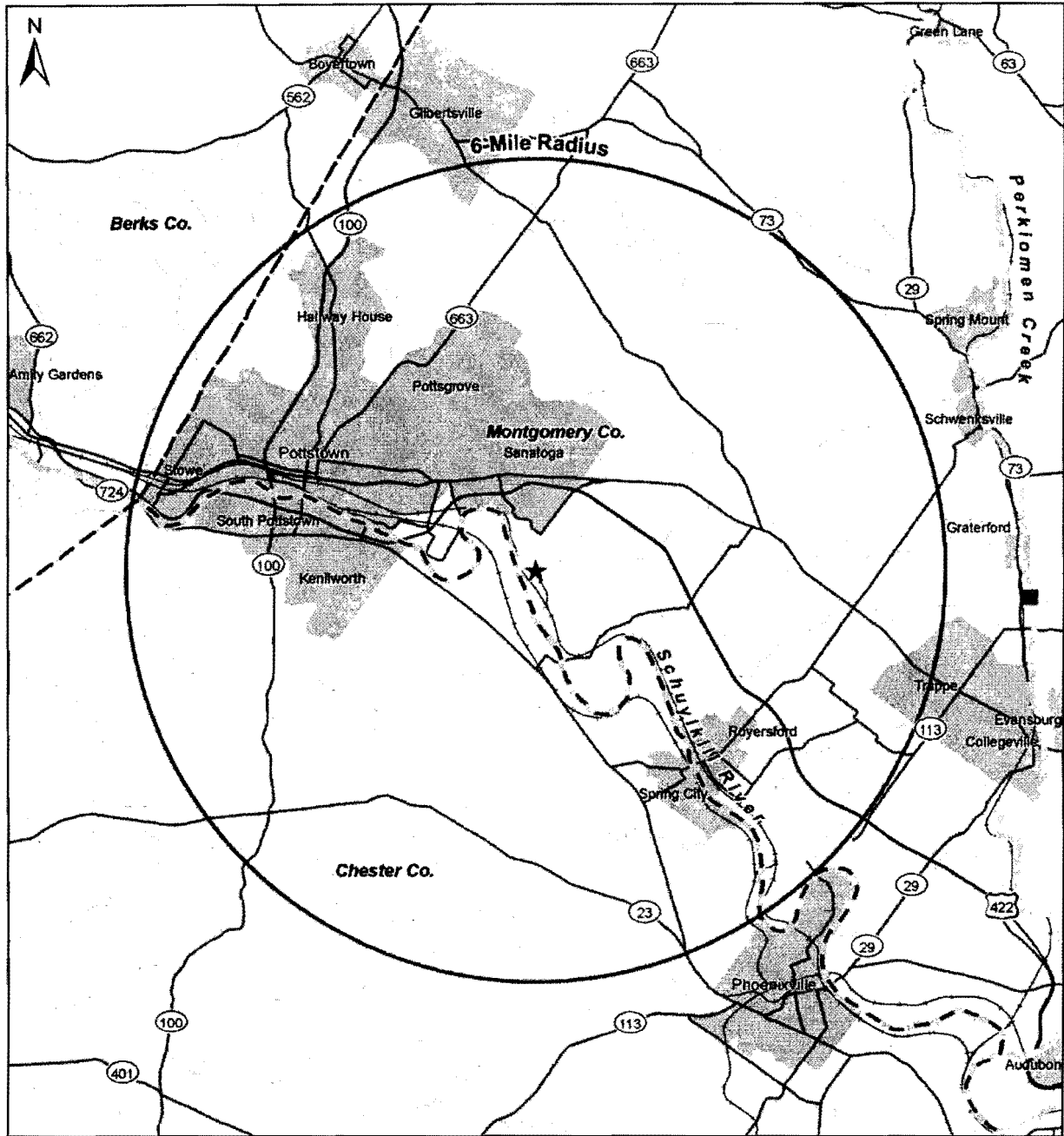
NAD 1983 State Plane Pennsylvania South  
Projection: Lambert Conformal Conic  
Linear Unit: Foot US



**Legend**

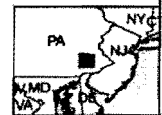
- Cooling Tower Blowdown Line
- Diffuser Pipe
- ▭ County Boundary

Figure 3.1-4 Cooling Tower Blowdown  
Diffuser Location  
Exelon Generation  
Limerick Generating Station  
Limerick Township, Montgomery County, PA



**Exelon.**

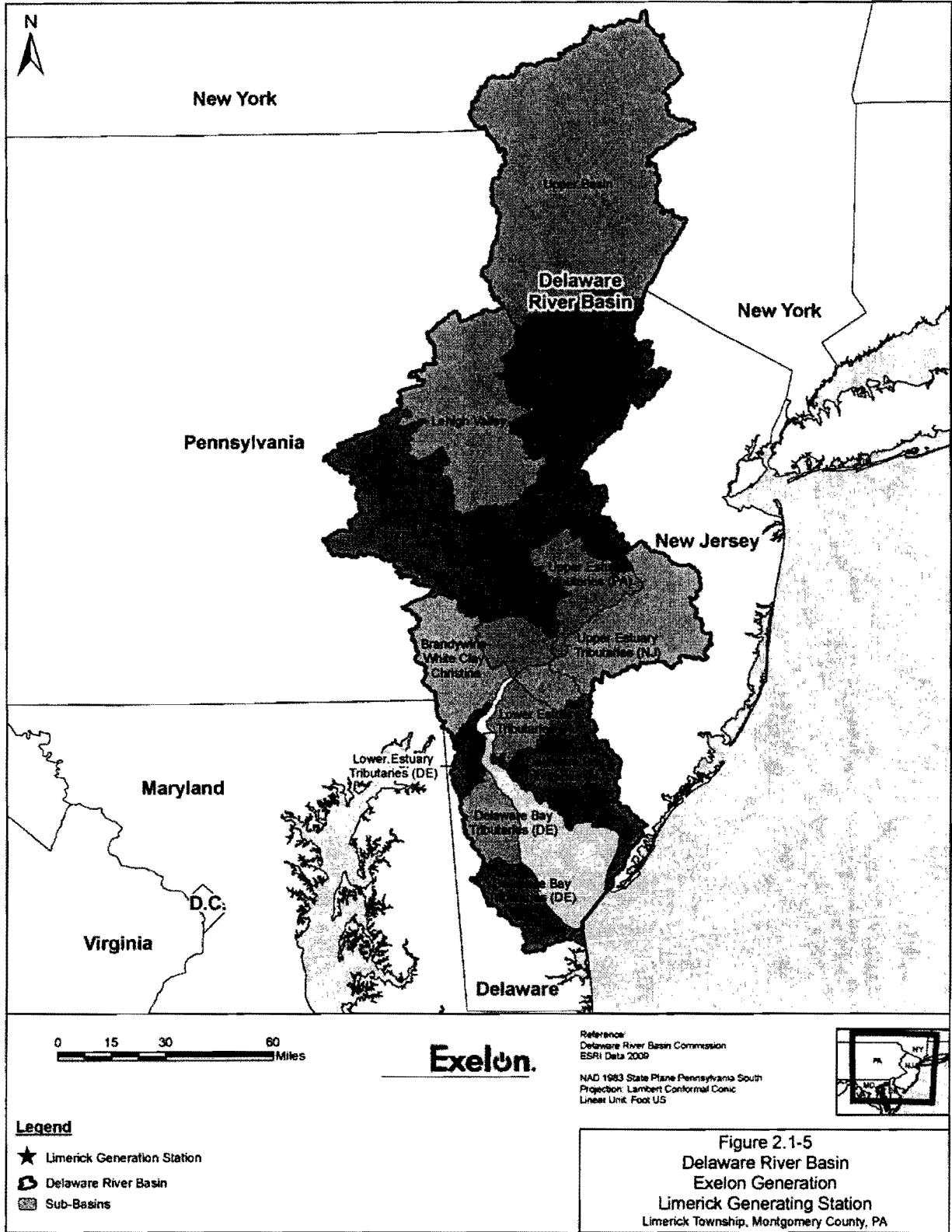
Reference:  
 ESRI 2000 Streets and Roads  
 NAD 1983 State Plane Pennsylvania South  
 Projection, Lambert Conformal Conic  
 Linear Unit: Foot US

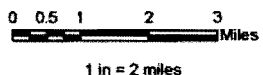
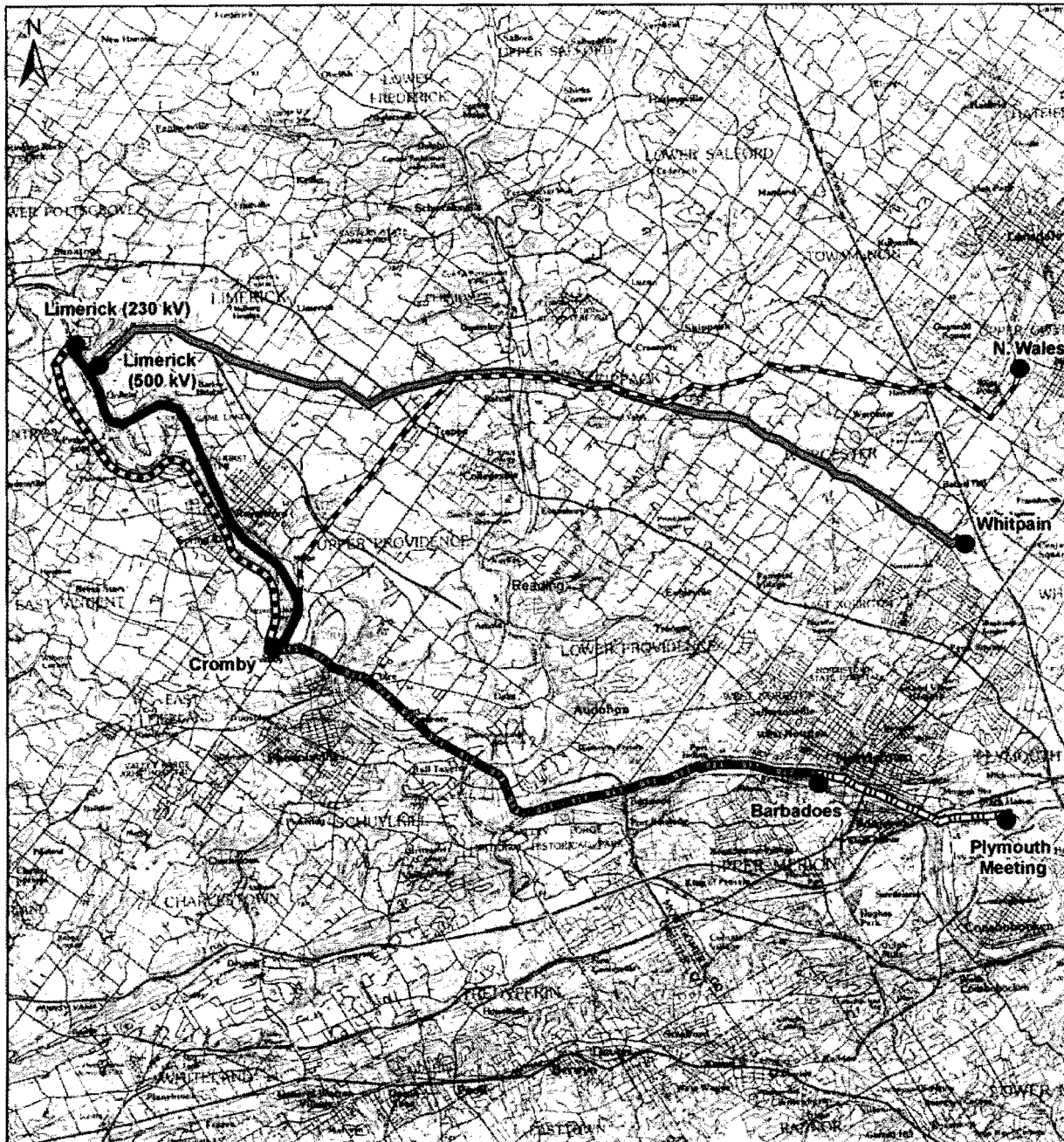


**Legend**

- ★ Limerick Generation Station
- Perkiomen Pumphouse
- 6-Mile Radius
- - - County Boundary
- Ⓢ State Route
- Ⓡ U.S. Highway

**Figure 2.1-3 6-Mile Vicinity Map  
 Exelon Generation  
 Limerick Generating Station  
 Limerick Township, Montgomery County, PA**

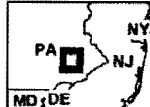




**Exelon.**

Reference:  
Reading (1884) & Trenton (1908)  
100K Scale Topo Maps

NAD 1983 State Plane Pennsylvania South  
Projection: Lambert Conformal Conic  
Linear Unit: Foot US



**Legend**

- Substation
- 230 kV Voltage
- 500 kV Voltage
- ⚡ Cromby-Barbadoes 220-63
- ⚡ Barbadoes-PlymMeeting 220-64
- ⚡ Limerick-Cromby 220-60 Line
- ⚡ Limerick-Cromby 220-61 Line
- ⚡ Cromby-N Wales 220-62 Line
- ⚡ Limerick-Whitpain 5031 Line

**Figure 2.1-6 LGS Transmission Line Route Map**  
Exelon Generation  
Limerick Generating Station  
Montgomery & Chester Counties, PA



**Michael P. Gallagher, PE**  
Vice President  
License Renewal Projects

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Exelon Nuclear  
200 Exelon Way  
KSA/2-F  
Kennett Square, PA 19348

January 19, 2011

**Ms. Chris Firestone**  
Pennsylvania Department of Conservation & Natural Resources  
Bureau of Forestry - Plant Program  
Forest Advisory Services  
P.O. Box 8552  
Harrisburg, PA 17105-1673

**Re: Renewal of Operating Licenses for Limerick Generating Station, Units 1 and 2  
Request for Information on Listed Threatened and Endangered Species**

Dear Ms. Firestone:

In mid-2011, Exelon Generation Company, LLC (Exelon Generation; a subsidiary of Exelon Corporation) plans to apply to the U.S. Nuclear Regulatory Commission (NRC) for renewal of the operating licenses for Limerick Generating Station, Units 1 and 2 (LGS). The existing license for Unit 1 will expire on October 26, 2024 and the existing license for Unit 2 will expire on June 22, 2029. The renewal term for each unit would be an additional twenty years beyond the existing license expiration date.

The NRC requires that license renewal applications include environmental reports assessing potential environmental impacts from license renewal activities. One such impact would be effects of license renewal activities on threatened and endangered species that are listed or proposed for listing in accordance with the Endangered Species Act (ESA) (16 USC 1531, et seq.) (10 CFR 51.53(c)(3)(ii)(E)). Accordingly, we are contacting you to obtain input for use in addressing these effects in the LGS license renewal environmental report. Later, NRC may also request an informal consultation with your office consistent with Section 7 of the ESA (16 USC 1536(a)).

### **Project Features**

LGS existing features that are relevant to the effects of license renewal on threatened and endangered species include the following:

1. The LGS plant site, which hosts the two generating units, is located on Exelon Generation-owned properties that are mostly situated in Limerick Township, Montgomery County, but some of which are in the adjacent Lower Pottsgrove Township, Montgomery County or directly across the Schuylkill River in East Coventry Township, Chester County.
2. The LGS makeup water supply system, which conveys water from approved sources to LGS for use in its circulating water system, is composed of the following components:
  - o The Perkiomen Pumphouse, located in Graterford Township, Montgomery County, and an associated underground 7.6-mile long Perkiomen Pumphouse-to-LGS pipeline; both are located along an easement held by Exelon Generation within an electrical transmission line right-of-way (ROW) controlled by PECO, a subsidiary of Exelon Corporation;
  - o The Bradshaw Reservoir and Bradshaw Pumphouse, which are both situated in Plumstead Township, Bucks County, on Exelon Generation-owned properties totaling 42 acres;
  - o The Bedminster Water Processing Facility, which is situated in Bedminster Township, Bucks County, on a 3-acre Exelon Generation-owned property; and
  - o An underground water transmission main, which is routed within a natural gas pipeline ROW along an easement held by Exelon Generation that runs from the Bradshaw Pumphouse to the East Branch Perkiomen Creek by way of the Bedminster Facility.

The buried Perkiomen Pumphouse-to-LGS water pipeline and the underground water transmission main are located below ground within ROWs that exist for other purposes, and their operation requires no independent vegetation management or ground disturbing activities along these ROWs. Hence, these underground components of the makeup water supply system are assumed to have no effects on threatened and endangered plant species.

3. The LGS transmission system is composed of the following components:
  - o Two electrical transmission lines constructed to connect the LGS main power transformers with two onsite electrical substations (these components are located on the LGS plant site); and
  - o Four 230-kiloVolt (kV) and one 500-kV electrical transmission lines, with associated structures and offsite electrical substations, constructed to connect the onsite electrical substations to the regional electricity grid.

All offsite substations and transmission lines are operated by PECO and are located in ROWs situated in Montgomery and Chester Counties either on PECO-owned properties or on properties for which PECO holds permits, grants, easements, or licenses. Onsite transmission lines traverse only land that was disturbed during initial station construction.

Figures 1 through 9 showing the locations of the existing LGS project features are provided in Attachment 3.

### **Activities During the License Renewal Terms**

LGS license renewal will involve no new construction, refurbishment, ground disturbing activities, changes to operations, or changes to existing land-use conditions. Operation and maintenance activities during the terms of the renewed LGS licenses are only expected to occur in previously disturbed areas or existing ROWs. Hence, no new adverse impacts to threatened and endangered plant species are anticipated from license renewal.

### **Identification of Threatened and Endangered Species Resources**

Using the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Tool, a web-based application sponsored by the Pennsylvania Natural Heritage Program (PNHP), Exelon Generation has reviewed the potential for the LGS plant site area and the properties associated with the LGS makeup water supply system to adversely affect known occurrences of species or natural communities of concern. Receipts for PNDI search #s 20100421240174 (LGS plant site), 20100421240163 (Perkiomen Pumphouse area), 20100406237563 (Bradshaw Reservoir and Pumphouse area), and 20100407237630 (Bedminster Water Processing Facility area) are attached (Attachment 1). One "Special Concern Species" was identified for the LGS plant site: tooth-cup (*Rotala ramosior*). The responses for the other project sites stated that no impact is anticipated to threatened and endangered species and/or special concern species or resources.

Given the sizable acreage and distances associated with the LGS transmission line corridors, no PNDI searches were conducted for this project component. For review by your office in identifying species of concern, we instead offer the figures in Attachment 3 showing the routes and widths of the corridors.

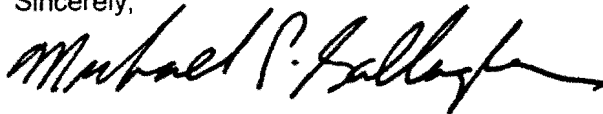
A review of the PNHP web site for state-listed endangered and threatened species indicates that numerous state-listed plant species could occur in Montgomery, Chester, and Bucks Counties. The enclosed Attachment 2 contains a list of these species. One perennial orchid species, the small whorled pogonia (*Isotria medeoloides*), state-listed as endangered, with Chester County as its recorded location, also is federally-listed as threatened. Although the American Holly (*Ilex opaca*), which is state-listed as threatened, was observed on the LGS plant site in 1978, Exelon Generation is not aware of the recent presence of any state-listed plant species on or near the properties associated with LGS and its associated transmission lines. Also, Exelon Generation and PECO adhere to regulatory requirements regarding sensitive areas that could contain state-listed threatened and endangered plant species and work closely with your department to protect these resources.

Because license renewal involves no new construction, refurbishment, ground disturbing activities, changes to operation, or changes to existing land use conditions, Exelon Generation does not expect LGS license renewal to adversely affect threatened and endangered plant species located near the LGS plant site, makeup water supply system, or transmission system ROWs. Nevertheless, we are requesting your help to identify issues we may have overlooked that need to be addressed in the LGS license renewal environmental report. We are also interested in learning of any information your staff believes could help expedite the NRC's review of the LGS license renewal application. Hence, in closing, we would appreciate receiving a response from you detailing such issues and information for the LGS plant site, makeup water supply system and transmission system. We would also welcome your confirmation of our conclusion that LGS license renewal would not adversely affect threatened and endangered plant species.

Because we plan to incorporate a copy of your response, as well as this letter, into the LGS license renewal environmental report that will be submitted to the NRC as part of the LGS license renewal application, your response will be most helpful if we receive it by March 10, 2011.

Please call Nancy Ranek (610-765-5369), our License Renewal Environmental Lead, if there are questions or you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Gallagher". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Gallagher

Enclosures:

- Attachment 1: Receipts for PNDI Search #s 20100421240174, 20100421240163, 20100406237563, and 20100407237630
- Attachment 2: Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties
- Attachment 3: Figures Depicting LGS Project Features (Figures 1 through 9)

**ATTACHMENT 1**

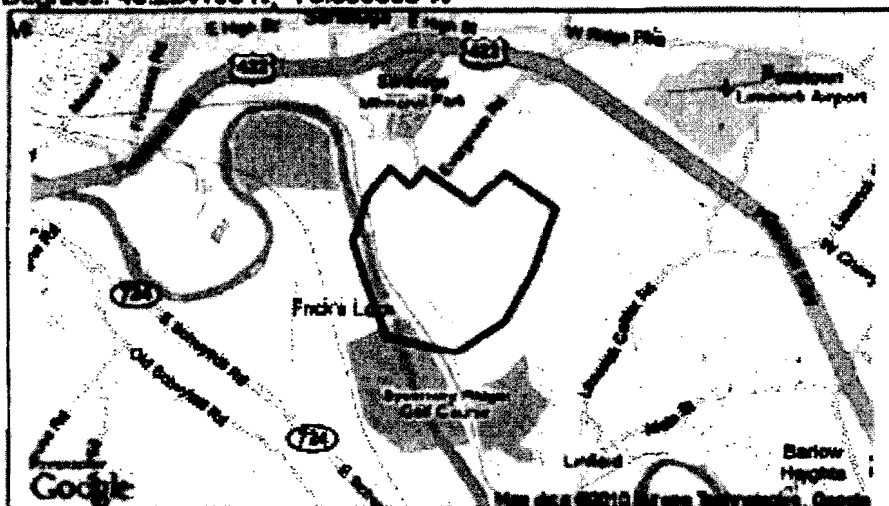
**Receipts for PNDI Searchs**

<u>Receipt for PNDI Search # 20100421240174, Limerick GS .....</u>	<u>2</u>
<u>Receipt for PNDI Search # 20100421240163, Perkiomen Pumphouse.....</u>	<u>7</u>
<u>Receipt for PNDI Search # 20100406237563, Bradshaw pump .....</u>	<u>11</u>
<u>Receipt for PNDI Search # 20100407237630, Bedminster WPF.....</u>	<u>16</u>

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

## 1. PROJECT INFORMATION

Project Name: Limerick GS  
 Date of review: 4/21/2010 4:33:48 PM  
 Project Category: Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant -- maintenance, modification, or expansion  
 Project Area: 483.8 acres  
 County: Chester, Montgomery Township/Municipality: East Coventry, Limerick, Lower Pottsgrove  
 Quadrangle Name: PHOENIXVILLE - ZIP Code: 19465, 19464  
 Decimal Degrees: 40.224106 N, -75.580658 W  
 Degrees



## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	Potential Impact	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
PA Fish and Boat Commission	Potential Impact	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

**PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174**

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

**RESPONSE TO QUESTION(S) ASKED**

**Q1: "Will the entire project (including any discharge) occur in or on an existing building, parking lot, driveway, road, road shoulder, street, runway, paved area, railroad bed, maintained (periodically mown) lawn, crop agriculture field or maintained orchard?"**

Your answer is: 3. Unknown

**Q2: Accurately describe what is known about wetland presence in the project area or on the land parcel. "Project" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected – either directly or indirectly – by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.). Land parcel = the lot(s) on which some type of project(s) or activity(s) are proposed to occur.**

Your answer is: 2. The project area (or land parcel) has not been investigated by someone qualified to identify and delineate wetlands, or it is currently unknown if the project or project activities will affect wetlands.

**Q3: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats**

Your answer is: 1. Yes

**3. AGENCY COMMENTS**

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt.

**PA Game Commission**

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

**PA Department of Conservation and Natural Resources**

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

**DCNR Species:**

Scientific Name: *Rotala ramosior*

Common Name: Tooth cup

Current Status: Special Concern Species\*

Proposed Status: Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

## PA Fish and Boat Commission

**PRBC Species:**

Scientific Name: Sensitive Species\*\*

Common Name:

Current Status: Threatened

Proposed Status: Special Concern Species\*

Scientific Name: *Stygobromus pizzinii*

Common Name: Pizzini's Cave Amphipod

Current Status: Special Concern Species\*

Proposed Status: Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

## U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no taxa of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

## WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, send the following information to the agency(ies) seeking the information (see AGENCY CONTACT INFORMATION).



PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

**Check-List of Minimum Materials to be submitted:**

- \_\_\_ SIGNED copy of this Project Environmental Review Receipt
- \_\_\_ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
- \_\_\_ Project location information (name of USGS Quadrangle, Township/Municipality, and County)
- \_\_\_ USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

The inclusion of the following information may expedite the review process.

- \_\_\_ A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
- \_\_\_ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
- \_\_\_ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams
- \_\_\_ The DEP permit(s) required for this project

#### **4. DEP INFORMATION**

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. For cases where a "Potential Impact" to threatened and endangered species has been identified before the application has been submitted to DEP, the application should not be submitted until the impact has been resolved. For cases where "Potential Impact" to special concern species and resources has been identified before the application has been submitted, the application should be submitted to DEP along with the PNDI receipt, a completed PNDI form and a USGS 7.5 minute quadrangle map with the project boundaries delineated on the map. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. DEP and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <http://www.naturalheritage.state.pa.us>.

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

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## 6. AGENCY CONTACT INFORMATION

**PA Department of Conservation and Natural Resources**  
Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552, Harrisburg, PA.  
17105-8552  
Fax: (717) 772-0271

**U.S. Fish and Wildlife Service**  
Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA.  
16801-4851  
NO Faxes Please.

**PA Fish and Boat Commission**  
Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
NO Faxes Please

**PA Game Commission**  
Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerston Avenue, Harrisburg, PA. 17110-8797  
Fax: (717) 787-6857

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 355 Commerce Dr, Suite 300  
City, State, Zip: Ft. Washington, PA 19384  
Phone: (215) 367-2598 Fax: (215) 367-1000  
Email: Cheryl\_marks@urscorp.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

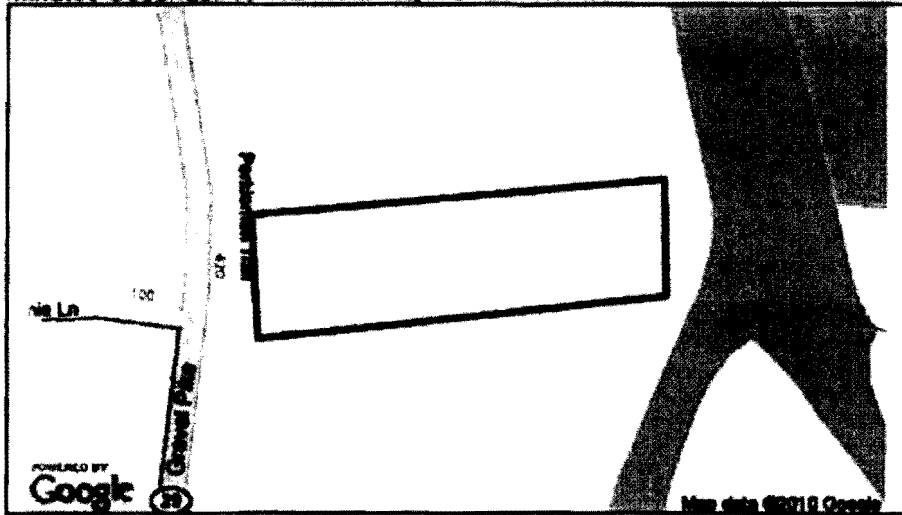
      4/2/10  
applicant/project proponent signature      date

PNDI Project Environmental Review Receipt

Project Search ID: 20100421240163

**1. PROJECT INFORMATION**

Project Name: **Perklomen Pumphouse**  
 Date of review: **4/21/2010 4:16:12 PM**  
 Project Category: **Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant – maintenance, modification, or expansion**  
 Project Area: **3.5 acres**  
 County: **Montgomery Township/Municipality: Perklomen**  
 Quadrangle Name: **COLLEGEVILLE ~ ZIP Code: 19426**  
 Decimal Degrees: **40.215611 N, -75.451022 W**  
 Degrees Minutes Seconds: **40° 12' 56.2" N, -75° 27' 3.7" W**



**2. SEARCH RESULTS**

<b>Agency</b>	<b>Results</b>	<b>Response</b>
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240163

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt.

#### PA Game Commission

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

**RESPONSE:** No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

### 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. For cases where a "Potential Impact" to threatened and endangered species has been identified before the application has been submitted to DEP, the application should not be submitted until the impact has been resolved. For cases where "Potential Impact" to special concern species and resources has been identified before the application has been submitted, the application

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240163

should be submitted to DEP along with the PNDI receipt, a completed PNDI form and a USGS 7.5 minute quadrangle map with the project boundaries delineated on the map. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. DEP and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <http://www.naturalheritage.state.pa.us>.

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240163

### 5. ADDITIONAL INFORMATION

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For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

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17105-8552  
Fax:(717) 772-0271

**U.S. Fish and Wildlife Service**  
Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA.  
16801-4851  
NO Faxes Please.

**PA Fish and Boat Commission**  
Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
NO Faxes Please

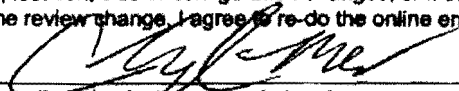
**PA Game Commission**  
Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax:(717) 787-6957

### 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr Suite 300  
City, State, Zip: Ft. Washington PA 19034  
Phone: (215) 367-2578 Fax: (215) 367-1000  
Email: Cheryl\_marks@URS Corp.com

### 8. CERTIFICATION

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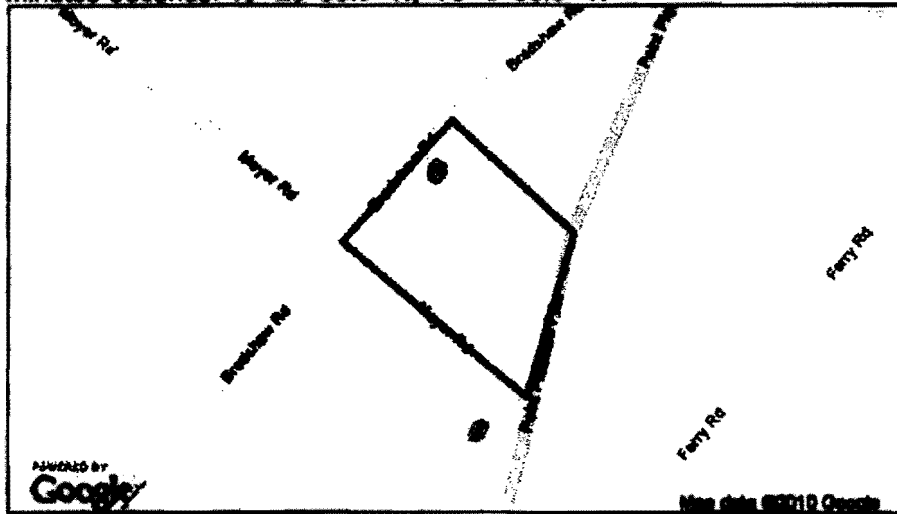
      4/21/10  
applicant/project proponent signature      date

PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

## 1. PROJECT INFORMATION

Project Name: **Bradshaw\_pump**  
 Date of review: **4/6/2010 3:53:37 PM**  
 Project Category: **Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant -- maintenance, modification, or expansion**  
 Project Area: **36.5 acres**  
 County: **Bucks Township/Municipality: Plumstead**  
 Quadrangle Name: **LUMBERVILLE - ZIP Code: 18947,18901**  
 Decimal Degrees: **40.397483 N, -75.093140 W**  
 Degrees Minutes Seconds: **40° 23' 50.9" N, -75° 5' 35.3" W**



## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	Potential Impact	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

PNDI Project Environmental Review Receipt      Project Search ID: 20100406237563

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

### RESPONSE TO QUESTION(S) ASKED

**Q1:** Accurately describe what is known about wetland presence in the project area or on the land parcel. "Project" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected -- either directly or indirectly -- by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.). Land parcel = the lot(s) on which some type of project(s) or activity(s) are proposed to occur.  
Your answer is: **2. The project area (or land parcel) has not been investigated by someone qualified to identify and delineate wetlands, or it is currently unknown if the project or project activities will affect wetlands.**

**Q2:** Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats  
Your answer is: **3. Unknown**

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt.

#### PA Game Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission



PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

**PFBC Species:**

**Scientific Name:** Sensitive Species\*\*

**Common Name:**

**Current Status:** Threatened

**Proposed Status:** Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impacts(s). Please send project information to this agency for review (see WHAT TO SEND).

**U.S. Fish and Wildlife Service**

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

**WHAT TO SEND TO JURISDICTIONAL AGENCIES**

If project information was requested by one or more of the agencies above, send the following information to the agency(s) seeking this information (see AGENCY CONTACT INFORMATION).

**Check-list of Minimum Materials to be submitted:**

- \_\_\_ SIGNED copy of this Project Environmental Review Receipt
- \_\_\_ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
- \_\_\_ Project location information (name of USGS Quadrangle, Township/Municipality, and County)
- \_\_\_ USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

**The inclusion of the following information may expedite the review process.**

- \_\_\_ A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
- \_\_\_ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
- \_\_\_ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams
- \_\_\_ The DEP permit(s) required for this project

PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

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PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

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## 6. AGENCY CONTACT INFORMATION

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17105-8552  
Fax: (717) 772-0271

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Fax: (717) 787-6957

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr Suite 300  
City, State, Zip: Ft. Washington, PA 19034  
Phone: (215) 367-2598 Fax: (215) 367-1000  
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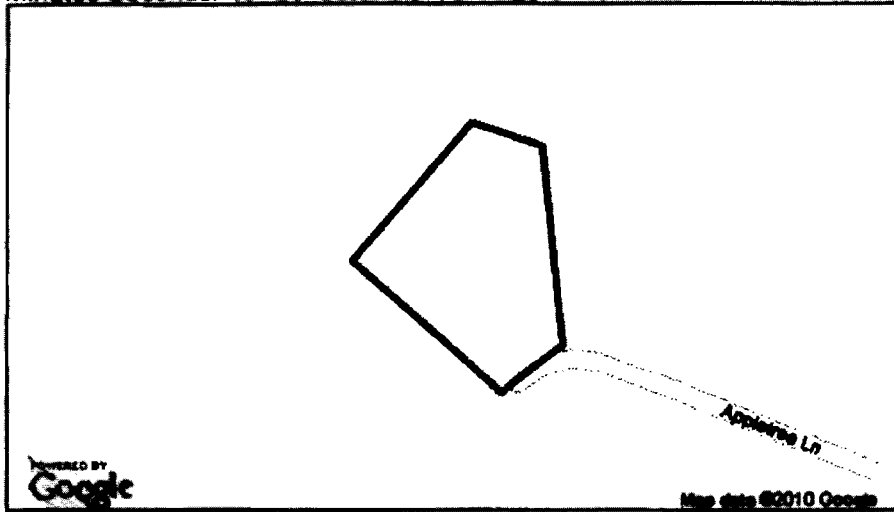
  
applicant/project proponent signature

4/21/10  
date

PNDI Project Environmental Review Receipt      Project Search ID: 20100407237630

**1. PROJECT INFORMATION**

Project Name: **Bedminster\_WPF**  
 Date of review: **4/7/2010 10:02:31 AM**  
 Project Category: **Energy Storage, Production, and Transfer,Energy Production (generation),Nuclear Power Plant – maintenance, modification, or expansion**  
 Project Area: **2.4 acres**  
 County: **Bucks Township/Municipality: Bedminster**  
 Quadrangle Name: **BEDMINSTER ~ ZIP Code: 18947**  
 Decimal Degrees: **40.399023 N, -75.158205 W**  
 Degrees Minutes Seconds: **40° 23' 56.5" N, -75° 9' 29.5" W**



**2. SEARCH RESULTS**

<b>Agency</b>	<b>Results</b>	<b>Response</b>
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

PNDI Project Environmental Review Receipt      Project Search ID: 20100407237630

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### 3. AGENCY COMMENTS

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**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

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#### PA Fish and Boat Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

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PNDI Project Environmental Review Receipt

Project Search ID: 20100407237630

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### 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr, Suite 300  
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Email: cheryl\_marks@urscorp.com

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Cheryl Marks      4/21/10  
applicant/project proponent signature      date

**ATTACHMENT 2**

**State-Listed Endangered and Threatened Species**



Attachment 2

Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties				
Scientific Name	Common Name	Federal Status	State Status	Counties with Recorded Location
<i>Agalinis auriculata</i>	Eared False-foxglove	--	Endangered	Montgomery, Chester, Bucks
<i>Ammanian coccinea</i>	Scarlet Ammannia	--	Endangered	Bucks
<i>Arabis missouriensis</i>	Missouri Rock-cress	--	Endangered	Montgomery
<i>Arethusa bulbosa</i>	Swamp-pink	--	Endangered	Chester
<i>Aristida purpurascens</i>	Arrow-feathered Three Awned	--	Threatened	Chester, Bucks
<i>Arnica acaulis</i>	Leopard's-bane	--	Endangered	Chester
<i>Asplenium bradleyi</i>	Bradley's Spleenwort	--	Threatened	Chester
<i>Bidens bidentoides</i>	Swamp Beggar-ticks	--	Threatened	Bucks
<i>Bouteloua curtipendula</i>	Tall Gramma	--	Threatened	Chester
<i>Carex alata</i>	Broad-winged Sedge	--	Threatened	Bucks
<i>Carex bicknellii</i>	Bicknell's Sedge	--	Endangered	Chester, Bucks
<i>Carex bullata</i>	Bull Sedge	--	Endangered	Chester, Bucks
<i>Carex crinita</i> var. <i>brevicrinis</i>	Short Hair Sedge	--	Endangered	Chester, Bucks
<i>Carex polymorpha</i>	Variable Sedge	--	Endangered	Chester
<i>Carex prairea</i>	Prairie Sedge	--	Threatened	Bucks
<i>Carex stenilis</i>	Sterile Sedge	--	Threatened	Montgomery, Bucks
<i>Carex tetanica</i>	A Sedge	--	Threatened	Chester, Bucks
<i>Carex typhina</i>	Cattail Sedge	--	Endangered	Montgomery, Chester, Bucks
<i>Cerastium arvense</i> var. <i>villosissimum</i>	Serpentine Chickweed	--	Endangered	Chester
<i>Chasmanthium laxum</i>	Slender Sea-oats	--	Endangered	Bucks
<i>Chrysopsis mariana</i>	Maryland Golden-aster	--	Threatened	Chester, Bucks
<i>Cirsium horridulum</i>	Horrible Thistle	--	Endangered	Chester
<i>Clematis viorna</i>	Vase-vine Leather-flower	--	Endangered	Chester
<i>Cyperus diandrus</i>	Umbrella Flatsedge	--	Endangered	Chester, Bucks
<i>Cyperus refractus</i>	Reflexed Flatsedge	--	Endangered	Montgomery, Bucks
<i>Cyperus retrorsus</i>	Retorse Flatsedge	--	Endangered	Bucks
<i>Dodecatheon radicum</i>	Jeweled Shooting-star	--	Threatened	Montgomery
<i>Echinochloa walteri</i>	Walter's Barnyard-grass	--	Endangered	Bucks
<i>Eleocharis obtuse</i> var. <i>peasei</i>	Wright's Spike-rush	--	Endangered	Bucks
<i>Eleocharis parvula</i>	Little-spike Spike-rush	--	Endangered	Bucks
<i>Eleocharis quadrangulata</i>	Four-angled Spike-rush	--	Endangered	Bucks
<i>Elephantopus carolinianus</i>	Elephant's foot	--	Endangered	Chester
<i>Ellisia nyctelea</i>	Ellisia	--	Threatened	Montgomery,

<b>Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties</b>				
<b>Scientific Name</b>	<b>Common Name</b>	<b>Federal Status</b>	<b>State Status</b>	<b>Counties with Recorded Location</b>
				Chester, Bucks
<i>Epilobium strictum</i>	Downy Willow-herb	--	Endangered	Montgomery, Bucks
<i>Eriophorum gracile</i>	Slender Cotton-grass	--	Endangered	Montgomery, Bucks
<i>Eriophorum tenellum</i>	Rough Cotton-grass	--	Endangered	Chester
<i>Eriophorum viridicarinatum</i>	Thin-leaved Cotton-grass	--	Threatened	Bucks
<i>Euphorbia ipecacuanhae</i>	Wild Ipecac	--	Endangered	Bucks
<i>Euphorbia purpurea</i>	Glade Spurge	--	Endangered	Chester
<i>Eurybia spectabilis</i>	Low Showy Aster	--	Endangered	Bucks
<i>Euthamia tenuifolia</i>	Grass-leaved Goldenrod	--	Threatened	Montgomery, Bucks
<i>Festuca paradoxa</i>	Cluster Fescue	--	Endangered	Chester
<i>Fimbristylis annua</i>	Annual Fimbry	--	Threatened	Chester
<i>Gaylussacia dumosa</i>	Dwarf Huckleberry	--	Endangered	Montgomery, Chester
<i>Glyceria obtusa</i>	Blunt Manna-grass	--	Endangered	Montgomery
<i>Helianthemum bicknellii</i>	Bicknell's Hoary Rockrose	--	Endangered	Chester, Bucks
<i>Heteranthera multiflora</i>	Multi-flowered Mud-plantain	--	Endangered	Bucks
<i>Hypericum majus</i>	Larger Canadian St. John's-wort	--	Threatened	Chester
<i>Ilex opaca</i>	American Holly	--	Threatened	Chester, Bucks
<i>Iris prismatica</i>	Slender Blue Iris	--	Endangered	Montgomery, Chester, Bucks
<i>Iris verna</i>	Dwarf Iris	--	Endangered	Bucks
<i>Isotria medeoloides</i>	Small-whorled Pogonia	Threatened	Endangered	Chester
<i>Juncus dichotomus</i>	Forked Rush	--	Endangered	Montgomery, Chester, Bucks
<i>Juncus scirpoides</i>	Scirpus-like Rush	--	Endangered	Montgomery, Chester, Bucks
<i>Juncus torreyi</i>	Torrey's Rush	--	Threatened	Chester
<i>Linum intercursum</i>	Sandplain Wild Flax	--	Endangered	Montgomery, Chester, Bucks
<i>Listera australis</i>	Southern Twayblade	--	Endangered	Chester
<i>Listera cordata</i>	Heart-leaved Twayblade	--	Endangered	Bucks
<i>Lobelia kalmii</i>	Brook Lobelia	--	Endangered	Montgomery
<i>Lobelia puberula</i>	Downy Lobelia	--	Endangered	Chester
<i>Lycopodiella alopecuroides</i>	Foxtail Clubmoss	--	Endangered	Bucks
<i>Lycopodiella appressa</i>	Southern Bog Clubmoss	--	Threatened	Bucks
<i>Lycopus rubellus</i>	Bugleweed	--	Endangered	Bucks
<i>Lyonia mariana</i>	Stagger-bush	--	Endangered	Montgomery, Chester, Bucks

<b>Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties</b>				
<b>Scientific Name</b>	<b>Common Name</b>	<b>Federal Status</b>	<b>State Status</b>	<b>Counties with Recorded Location</b>
<i>Magnolia tripetala</i>	Umbrella Magnolia	--	Threatened	Chester, Bucks
<i>Magnolia virginiana</i>	Sweet bay magnolia	--	Threatened	Montgomery, Chester, Bucks
<i>Myriophyllum farwellii</i>	Farwell's Water-milfoil	--	Endangered	Bucks
<i>Myriophyllum heterophyllum</i>	Broad-leaved Water-milfoil	--	Endangered	Bucks
<i>Nymphoides cordata</i>	Floating-heart	--	Threatened	Bucks
<i>Panicum amarum</i> var. <i>amarulum</i>	Southern Sea-beach Panic-grass	--	Threatened	Bucks
<i>Panicum scoparium</i>	Velvety Panic-grass	--	Endangered	Chester, Bucks
<i>Parnassia glauca</i>	Carolina Grass-of-parnassus	--	Endangered	Bucks
<i>Phemeranthus teretifolius</i>	Round-leaved Fame-flower	--	Threatened	Chester
<i>Phyllanthus caroliniensis</i>	Carolina Leaf-flower	--	Endangered	Chester
<i>Poa autumnalis</i>	Autumn Bluegrass	--	Endangered	Chester, Bucks
<i>Poa paludigena</i>	Bog Bluegrass	--	Threatened	Chester
<i>Polygala cruciata</i>	Cross-leaved Milkwort	--	Endangered	Montgomery, Chester, Bucks
<i>Polygala curtissii</i>	Curtis's Milkwort	--	Endangered	Chester
<i>Polygala incarnata</i>	Pink Milkwort	--	Endangered	Chester
<i>Polystichum braunii</i>	Braun's Holly Fern	--	Endangered	Bucks
<i>Populus balsamifera</i>	Balsam Poplar	--	Endangered	Montgomery
<i>Potamogeton pulcher</i>	Spotted Pondweed	--	Endangered	Bucks
<i>Potentilla paradoxa</i>	Bushy Cinquefoil	--	Endangered	Montgomery
<i>Prunus maritima</i>	Beach Plum	--	Endangered	Montgomery, Bucks
<i>Ptelea trifoliata</i>	Common Hop-tree	--	Threatened	Bucks
<i>Ptilimnium capillaceum</i>	Mock Bishop-weed	--	Endangered	Bucks
<i>Pycnanthemum torrei</i>	Torrey's Mountain-mint	--	Endangered	Bucks
<i>Quercus falcata</i>	Southern Red Oak	--	Endangered	Montgomery, Chester, Bucks
<i>Quercus phellos</i>	Willow Oak	--	Endangered	Chester, Bucks
<i>Ranunculus fascicularis</i>	Tufted Buttercup	--	Endangered	Montgomery, Chester
<i>Rhamnus lanceolata</i>	Lance-leaved Buckthorn	--	Endangered	Chester
<i>Rhexia mariana</i>	Maryland Meadow-beauty	--	Endangered	Chester, Bucks
<i>Rhynchospora capillacea</i>	Capillary Beaked-rush	--	Endangered	Bucks
<i>Sagittaria calycina</i> var. <i>spongiosa</i>	Long-lobed Arrow-head	--	Endangered	Bucks
<i>Scaphiopus holbrookii</i>	Eastern Spadefoot	--	Endangered	Bucks
<i>Schoenoplectus smithii</i>	Smith's Bulrush	--	Endangered	Bucks
<i>Scleria minor</i>	Minor Nutrush	--	Endangered	Chester
<i>Scleria muehlenbergii</i>	Reticulated Nutrush	--	Endangered	Chester

<b>Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties</b>				
<b>Scientific Name</b>	<b>Common Name</b>	<b>Federal Status</b>	<b>State Status</b>	<b>Counties with Recorded Location</b>
<i>Scleria pauciflora</i>	Few Flowered Nutrush	--	Threatened	Montgomery, Chester, Bucks
<i>Sedum rosea</i>	Roseroot Stonecrop	--	Endangered	Bucks
<i>Sericocarpus linifolius</i>	Narrow-leaved White-topped Aster	--	Endangered	Montgomery, Chester, Bucks
<i>Sisyrinchium atlanticum</i>	Eastern Blue-eyed Grass	--	Endangered	Chester, Bucks
<i>Sparganium androcladum</i>	Branching Bur-reed	--	Endangered	Bucks
<i>Spiranthes romanzoffiana</i>	Hooded Ladies'-tresses	--	Endangered	Montgomery
<i>Spiranthes vernalis</i>	Spring Ladies'-tresses	--	Endangered	Montgomery, Chester
<i>Sporobolus heterolepis</i>	Prairie Dropseed	--	Endangered	Chester
<i>Symphotrichum depauperatum</i>	Serpentine Aster	--	Threatened	Chester
<i>Symphotrichum novi-belgii</i>	New York Aster	--	Threatened	Montgomery, Bucks
<i>Triphora trianthophora</i>	Nodding Pogonia	--	Endangered	Montgomery, Chester, Bucks
<i>Triplasis purpurea</i>	Purple Sandgrass	--	Endangered	Bucks
<i>Trollius laxus</i>	Spreading Globeflower	--	Endangered	Bucks
<i>Utricularia intermedia</i>	Flat-leaved Bladderwort	--	Threatened	Bucks
<i>Utricularia radiata</i>	Small Swollen Bladderwort	--	Endangered	Bucks
<i>Vernonia glauca</i>	Tawny Ironweed	--	Endangered	Montgomery, Chester
<i>Viburnum nudum</i>	Possum-haw	--	Endangered	Montgomery, Chester, Bucks
<i>Viola brittoniana</i>	Coast Violet	--	Endangered	Bucks

Note: -- in the Federal Status column signifies that the species is not a federally-listed species.

## **ATTACHMENT 3**

### **Figures Depicting LGS Project Features**

Figure 1 LGS Plant Site Property Boundaries

Figure 2 Perkiomen Pumphouse

Figure 3 LGS Makeup Water Supply System

Figure 4 Bradshaw Reservoir and Bradshaw Pumphouse Properties

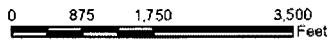
Figure 5 Bedminster Water Processing Facility Property

Figure 6 Limerick to Cromby 230 kV Transmission Line Route

Figure 7 Cromby to North Wales 230 kV Transmission Line

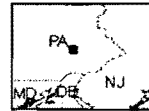
Figure 8 Cromby to Plymouth Meeting 230 kV Transmission Line Route

Figure 9 Limerick to Whitpain 500 kV Transmission Line Route



**Exelon.**

Reference:  
 DVRPC 2005 Aerial Imagery  
 ESRI 2009 Streets and Roads  
 NAD 1983 State Plane Pennsylvania South  
 Projection: Lambert Conformal Conic  
 Linear Unit: Foot US  
 Total Exelon Generation-owned property:  
 645 acres



**Legend**

- Exelon Generation Property Boundary
- County Boundary
- Municipal Boundary
- 2500 Ft Radius Exclusion Area
- Conrail Line

**Figure 1 LGS Plant Site Property Boundaries**  
 Exelon Generation  
 Limerick Generating Station  
 Limerick Township, Montgomery County, PA



0 1,000 2,000 4,000 Feet

**Exelon.**

Reference:  
USGS Topographic Quadrangle  
Cokeville, 1998

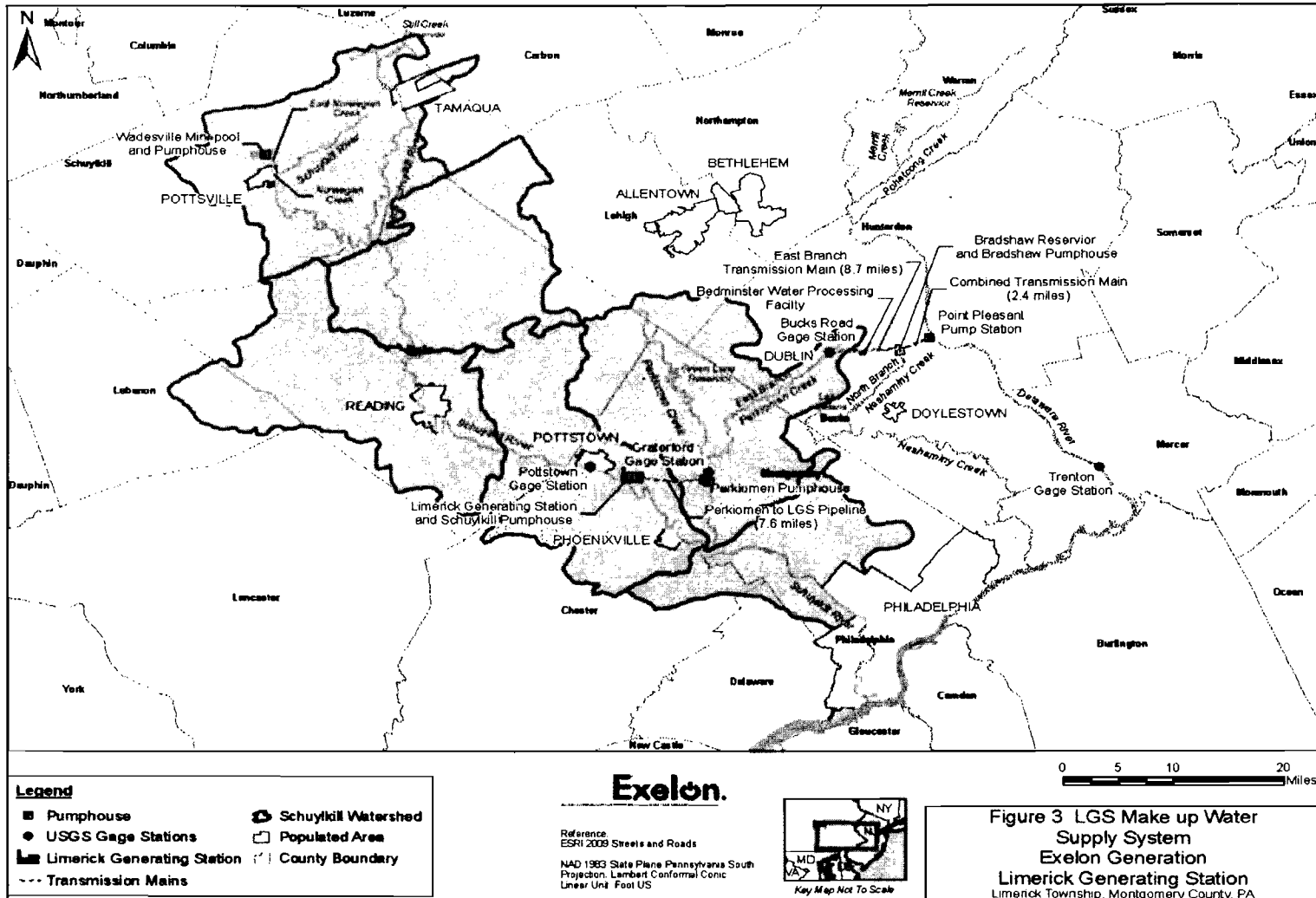
NAD 1983 State Plane Pennsylvania South  
Projection: Lambert Conformal Conic  
Linear Unit: Foot US

**Legend**

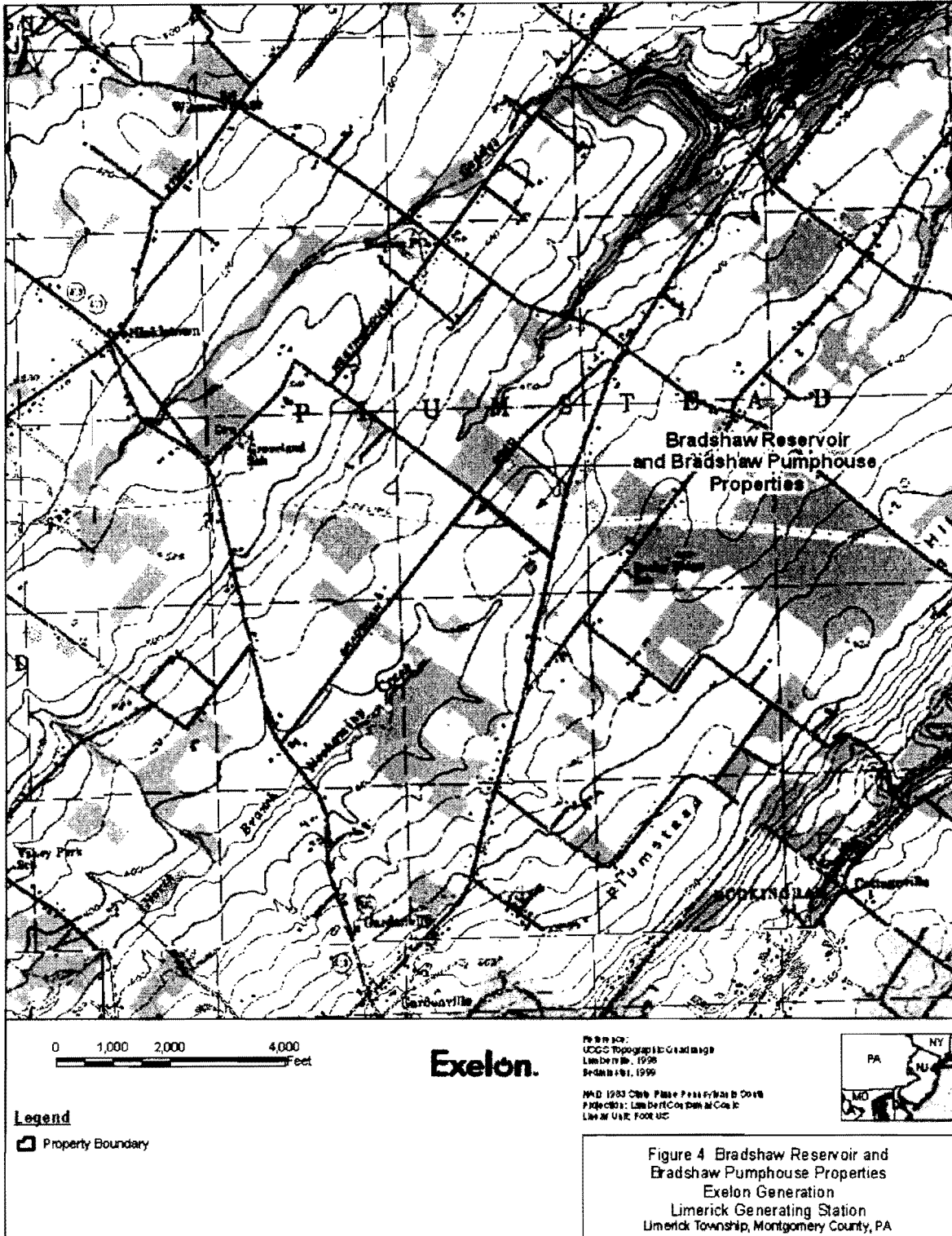
■ Pumphouse Location

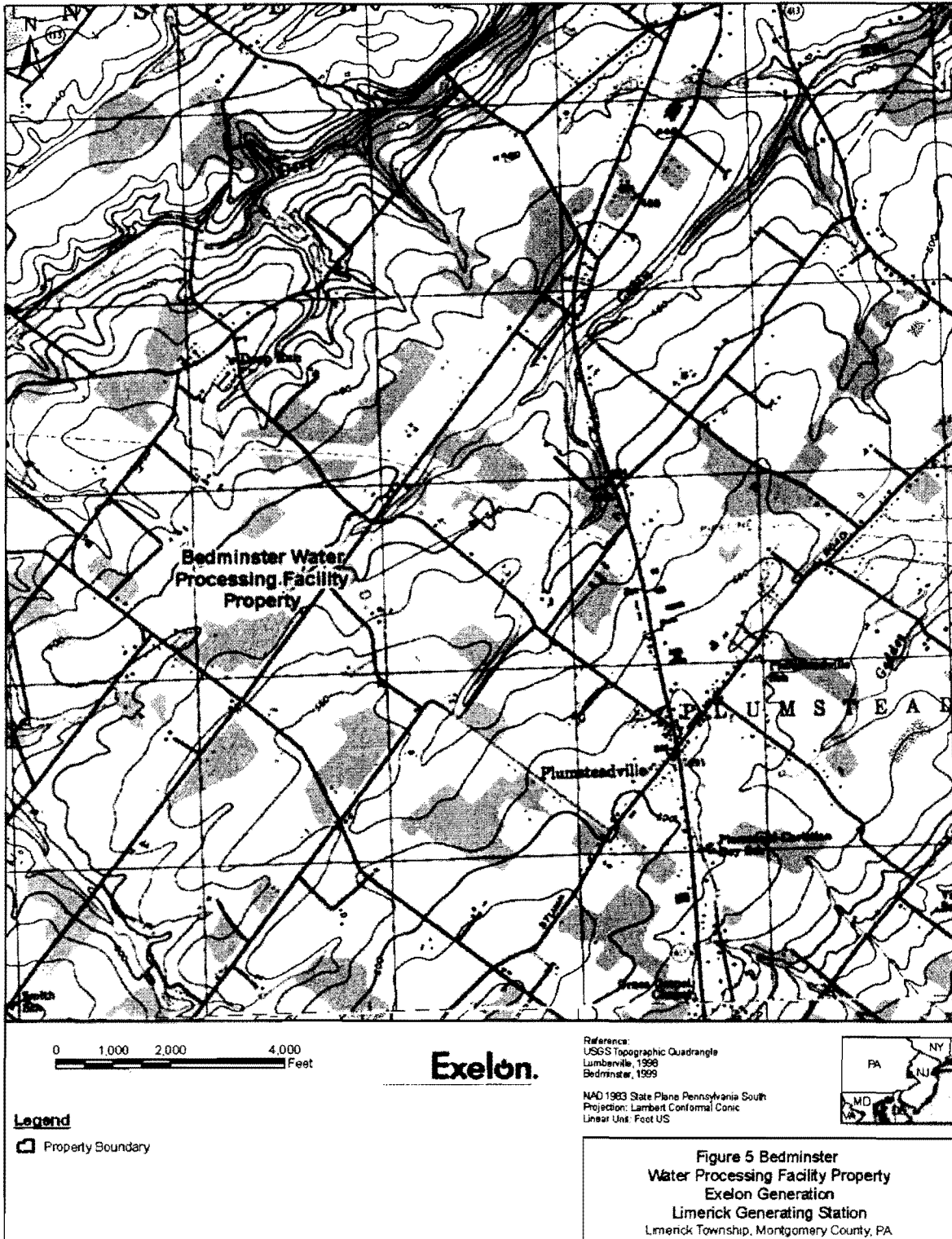
**Figure 2 Perkioinen Pumphouse  
Exelon Generation  
Limerick Generating Station**

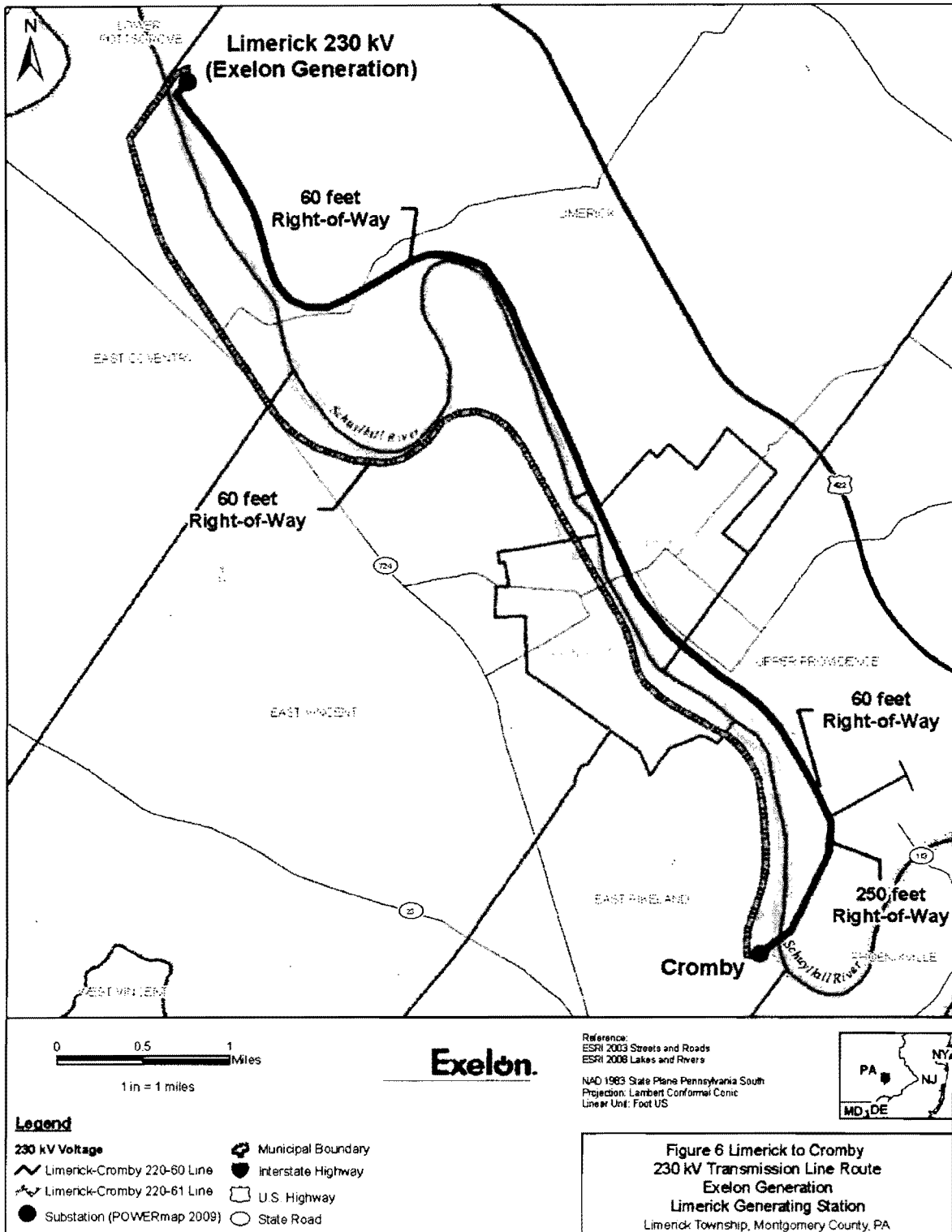
Limerick Township, Montgomery County, PA

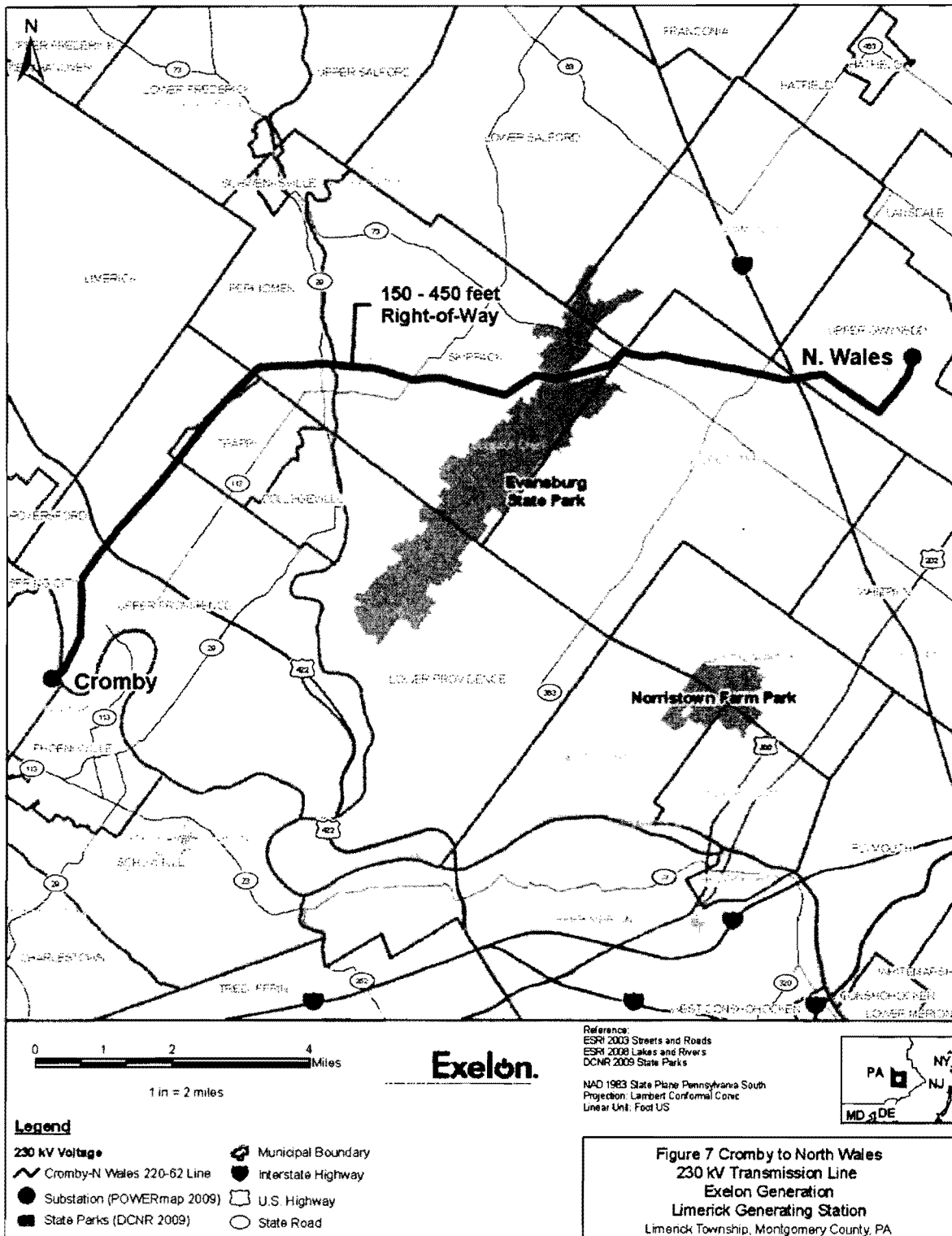


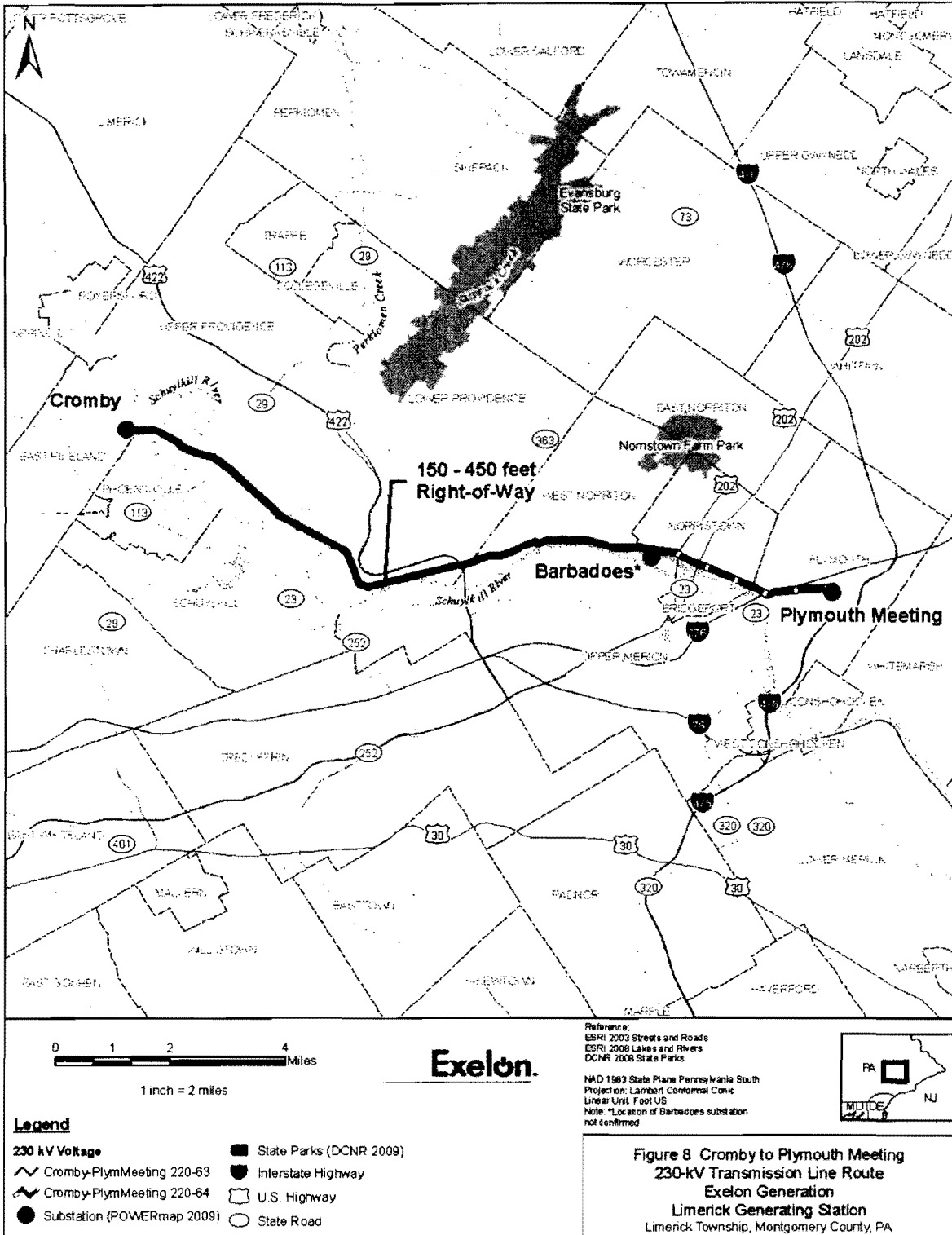


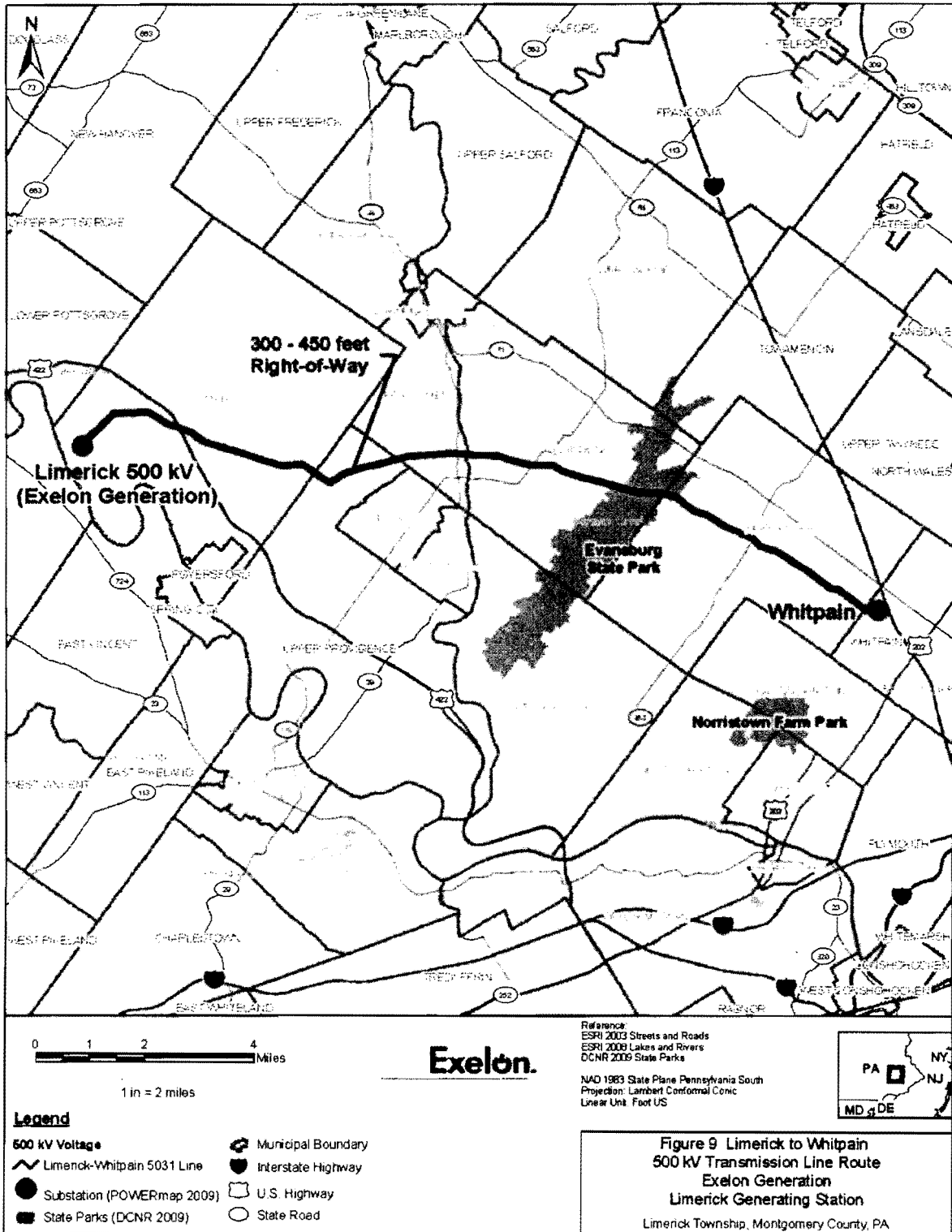














BUREAU OF FORESTRY

March 9, 2011

**PNDI Number: 21136**

21136  
3.15.11

**Michael P. Gallagher, PE**  
**Exelon Nuclear**  
200 Exelon Way  
KSA/2-E  
Kennett Square, PA 19348

Re: Renewal of Operating Licenses for Limerick Generating Station, Units 1 and 2  
Chester, Montgomery, & Bucks Counties

Dear Mr. Gallagher,

Thank you for your submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Large Project Number 21136 for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

**No Impact Anticipated**

PNDI records indicate species or resources of concern are located in the vicinity of the project. However, since the renewal does not involve new construction, refurbishment, ground disturbance, changes to operations or existing land use conditions, DCNR has determined that no impact is likely to occur to species of special concern under our jurisdiction as a result of this project.

For your information, we have included details on the species of special concern which are known near the rights of way of the LGS transmission corridors. If plans change to include earth disturbance in these locations, please coordinate with us further.

**Limerick to Cromby 230kV Transmission Line Route**

***Rotala ramosior* (Tooth-cup, PA Rare):** habitat is described in Plants of PA, by Rhoads and Block as wet, sandy shores and other swampy open ground; flowers July-Sept. Tooth-cup is known in a wet wooded stretch along the west side of the Schuylkill River.

***Cyperus schweinitzii* (Schweinitz's flatsedge, PA Rare):** habitat includes dry or moist sand flats and dunes; flowering and fruiting time is mid-summer to early fall. Schweinitz's flatsedge was found in association with Tooth-cup in a wet wooded area along the west side of the Schuylkill River.

***Arabis missouriensis* (Missouri rock-cress, PA Endangered):** habitat includes dry slopes; flowers April-early June. Missouri rock-cress was found nearby in a dry forested slope with scattered outcrops of Brunswick red shale. If work is planned (especially ROW widening) in the future for the eastern Limerick -Cromby 220-60 Line, please coordinate with us further.

***Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.

**Cromby to North Wales 230kV Transmission Line Route**

Enclosure 7

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- Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.
- Iris prismatica* (Slender Blue Iris, PA Endangered):** habitat is moist meadows and sandy or gravelly shores; flowering time is late May-June. Slender blue iris was found nearby in gently sloping land, open with scattered red maples in a mossy floodplain of the Perkiomen Creek.
- Ranunculus fascicularis* (Tufted buttercup, PA Endangered):** habitat includes dry, think woods and exposed calcareous slopes and edges; flowers April-May. Tufted buttercup was found nearby in a ridgetop glade near trails in a state park.

**Cromby to Plymouth Meeting 230kV Transmission Line Route**

- Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.
- Andropogon gyrans* (Elliott's beardgrass, Currently unlisted, Proposed PA Rare):** habitat is dry or moist fields or open woods; flowering time is September to October. Elliott's beardgrass was found nearby in an old field.
- Cuscuta campestris* (Dodder, Currently Unlisted, Proposed PA Threatened):** habitat includes thickets and waste ground, parasitic on wild and cultivated hosts; flowers June-September, fruits July-October. This dodder species was previously found in an old impounding basin, near the Schuylkill River.
- Rotala ramosior* (Tooth-cup, PA Rare):** habitat includes wet, sandy shores and other swampy open ground; flowers July-Sept. This population of Tooth-cup was found on an exposed mud flat and sandy-cobbly shores of seasonally flooded shallow basins.

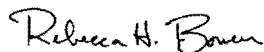
**Limerick to Whitpain Meeting 500kV Transmission Line Route**

- Ranunculus fascicularis* (Tufted buttercup, PA Endangered):** habitat includes dry, think woods and exposed calcareous slopes and edges; flowers April-May. Tufted buttercup was found nearby in a ridgetop glade near trails in a state park.
- Iris prismatica* (Slender Blue Iris, PA Endangered):** habitat is moist meadows and sandy or gravelly shores; flowering time is late May-June. Slender blue iris was found nearby in gently sloping land, open with scattered red maples in a mossy floodplain of the Perkiomen Creek.

This response represents the most up-to-date summary of the PNDI data files and is valid for one (1) year from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on-site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map).

This finding applies to impacts to DCNR only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure the U.S. Fish and Wildlife Service, PA Game Commission, and the Pennsylvania Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us).

Sincerely,



Rebecca H. Bowen, Environmental Review Manager FOR Chris Firestone, Wild Plant Program Mgr.  
Ph: 717-772-0258 ~ [c-rbowen@state.pa.us](mailto:c-rbowen@state.pa.us)

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not current, please provide any applicable updates. Both the January 2011 letter from Exelon and the March 2011 letter from The Pennsylvania Department of Conservation and Natural Resources are enclosed for your reference. In addition, please provide any information you consider appropriate under the provisions of the Fish and Wildlife Coordination Act.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011, in the area of Limerick. The first session will be held in the afternoon and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 p.m. until 4:00 p.m. and the evening session will be from 7:00 p.m. until 9:00 p.m. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open House. Your office will receive a copy of the draft SEIS along with a request for comments. The anticipated publication date for the draft SEIS is August 2012.

The Limerick license renewal application is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>. If you have any questions or require additional information, please contact Mrs. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,  
**/RA Lisa Regner for/**  
David J. Wrona, Chief  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:  
As stated

cc w/encls: Listserv

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Letter: **ML11230B346**  
Encls 1 – 5: **ML11230B335**  
Encls 6 – 7: **ML11256A192**

OFFICE	LA:RPOB:DLR	PM:RPB2:DLR	BC:RPB2:DLR
NAME	IKing	LRegner(PCooper for)	DWrona (LRegner for)
DATE	9/13/11	09/16/11	09/16/11

Letter to C. Firestone from D. Wrona dated September 16, 2011

SUBJECT: REQUEST FOR LIST OF PROTECTED SPECIES WITHIN THE AREA UNDER  
EVALUATION FOR THE LIMERICK GENERATING STATION, UNITS 1 AND 2,  
LICENSE RENEWAL APPLICATION REVIEW (PNDI NUMBER: 21136)

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DLR\_RPOB Resource

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NSieller, RI

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NSheehan, RI